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9 UMG Recordings, Inc., Universal Music Latin
10 Entertainment, and Disa Latin Music

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12 UNITED STATES DISTRICT COURT

13 EASTERN DISTRICT OF CALIFORNIA

14

FRESNO DIVISION

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16 YELLOWCAKE, INC., a California
17 corporation and LATIN POWER MUSIC
18 USA, LLC, a California limited liability
19 company,

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Plaintiffs,

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v.

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23 UNIVERSAL MUSIC GROUP,
24 INC., UNIVERSAL MUSIC LATIN
25 ENTERTAINMENT, DISA LATIN MUSIC,
26 UNIVERSAL MUSIC PUBLISHING
27 GROUP, VICTOR GONZALEZ, ANTONIO
28 SILVA, CORPORATIVO LATIN POWER
MUSIC SA DE CV and JOSE SERRANO
MONToya,

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Defendants.

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CASE NO. 1:22-CV-01109-JAM-CSK

STIPULATION TO CONTINUE THE
FACT DISCOVERY CUT-OFF BY 40
DAYS

Hon. John A. Mendez

Filed: 08/31/2022
Trial Date: 09/15/2025

1 **TO THE HONORABLE COURT:**

2 Plaintiffs Yellowcake , Inc. and Latin Power Music USA, LLC (“Plaintiffs”) on the one
3 hand, and Defendants UMG Recordings Inc. and its divisions Universal Music Latin
4 Entertainment and Disa Latin Music (together, “UMG”) on the other hand (collectively, the
5 “Parties”), by and through their respective attorneys, hereby agree and stipulate as follows with
6 reference to the following:

7 1. On October 8, 2024, Plaintiffs filed a Motion for Leave to File a Second Amended
8 Complaint and to Modify the Scheduling Order. ECF 47 (“Motion for Leave”). On December 20,
9 2024, Defendants Corporativo Latin Power Music SA de CV and Jose Serrano Montoya filed a
10 Motion to Set Aside Clerk’s Entry of Defaults. ECF 62 (“Motion to Set Aside the Default”).

11 2. On Monday, January 6, 2025, the Court ordered that both motions shall be heard, in
12 person, on January 21, 2025. ECF 69.

13 3. The outcome of those motions will determine whether up to three additional parties
14 will be joined in this litigation.

15 4. The deadline to complete fact discovery is currently set for February 7, 2025. The
16 parties have several depositions scheduled over the next three weeks, including the depositions of
17 both Plaintiffs, as well as their principal, scheduled in advance of the January 21st hearing,
18 beginning on January 13, 14, and 15, respectively, in Turlock, California.

19 5. Should the Court grant either the Motion for Leave or the Motion to Set Aside the
20 Default, it is likely that Plaintiffs will have to sit for additional depositions in order to
21 accommodate the newly-joined parties.

22 6. *Additionally, the Southern California fires are creating substantial hardship.*
23 *Lead counsel for UMG lives in Los Angeles, has already received an evacuation warning, and*
24 *expects to receive evacuation orders at any moment. The current schedule anticipates and*
25 *necessitates that counsel for UMG drive to Northern California (Turlock) this weekend for the*
26 *depositions beginning on Monday. It would be devastating for lead counsel to be away from his*
27 *home and family during this critical time.*

28 7. Therefore, the parties have agreed and hereby respectfully jointly request that the

discovery cutoff date be continued for 40 days, to March 19, 2025.

8. The requested continuance will allow the Parties to receive the Court's ruling on the pending motions without prejudice to their ability to take or sit for depositions, and will not affect any other deadlines.

9. In the event that the Court grants this request and denies the Motion for Leave and the Motion to Set Aside the Default, the Parties have agreed to reschedule the currently-noticed depositions, in the same order as currently noticed, before the updated discovery cut-off.

10. The Parties contacted Courtroom Deputy M York to clear this continuance date, who instructed that the Parties file a Joint Stipulation for the Court's review and consideration.

10 | **NOW THEREFORE**, the parties hereby agree and stipulate as follows:

11 1. The discovery cut-off currently scheduled for February 7, 2025 shall be continued
12 to **March 19, 2025**;

13 | 2. All other deadlines shall remain unchanged.

14 The Parties jointly request that the Court approve this Stipulation and enter an Order
15 hereon, continuing the discovery cut-off and modifying the Scheduling Order as set forth above.

16 | Dated: January 10, 2025

ABRAMS FENSTERMAN, LLP

By:/s/ Seth L. Berman

Seth L. Berman

Attorney for Plaintiffs Yellowcake, Inc. and Latin Power Music USA, LLC

20 | Dated: January 10, 2025

MITCHELL SILBERBERG & KNUPP LLP

By:/s/David A. Steinberg

David A. Steinberg

Alexandra L. Anfuso

Attorneys for Defendants UMG Recordings, Inc.,
Universal Music Latin Entertainment, and Disa Latin
Music

1 Dated: January 10, 2025

SINGH SINGH & TRAUBEN LLP

2 By:/s/Michael A. Trauben

3 Michael A. Trauben

4 Attorneys for Defendants Corporativo Latin Power
Music SA de CV and Jose Serrano Montoya

5 **Attestation Regarding Signatures**

6 I, David A. Steinberg, attest that all signatories listed, and on whose behalf the filing is
7 submitted, concur in the filing's content and have authorized the filing.

9 Dated: January 10, 2025

By: /s/ David A. Steinberg

10 David A. Steinberg

14 **ORDER**

15 Pursuant to the Stipulation to Continue the Discovery Cut-Off By 40 Days (the
16 "Stipulation") submitted by the Parties herein, and good cause appearing therefore, the Court
17 **APPROVES** of the Stipulation and **MODIFIES** the Scheduling Order as follows:

Event	Deadline
Discovery Cutoff Date	03/19/2025

20 All other deadlines and instructions contained in the July 22, 2024 Court Order (ECF
21 No. 46) and the October 2, 2023 Pretrial Scheduling Order (ECF No. 42), as applicable, shall
22 remain in effect.

23 IT IS SO ORDERED.

25 Dated: January 10, 2025

/s/ John A. Mendez

26 THE HONORABLE JOHN A. MENDEZ

27 SENIOR UNITED STATES DISTRICT JUDGE